REMARKS

Applicants thank the Examiner for the courtesies she extended to applicants' representatives during the interview held on October 23, 2008. During the interview, applicants' representatives agreed with the Examiner to amend claims 1, 35 and 36 to specify that the controller is "configured to pass the native values through a filtering process before <u>reporting the new values to the host device</u>." In addition, applicants' representatives' agreed to amend claim 35 to specify that the controller is part of the touch bad assembly as suggested by the Examiner. These amendments have been made herein.

In addition, during the interview, applicants' representatives explained why the currently pending claims are patentably distinct from the art cited by the Examiner. As explained during the interview, independent claim 1 claims a combination including a controller configured to perform two tasks: 1) adjust native values into new values associated with logical device units; and 2) pass the native values through a filtering process. As specified in the claim, by performing these tasks, the controller is able to reduce an amount of data sent to the host device. Reducing the data provided to the main processor of the host device can have several benefits, including increasing battery life of the device and increasing performance of the host device processor. None of the cited references disclose or suggest a similar combination including a controller configured to perform the claimed tasks prior to sending data to the host device, as claimed. Further, independent claims 26, 35 and 36 all include a combination similar to claim 1. Accordingly, it is respectfully submitted that these claims are patentably distinct from the references for at least these same reasons. Further distinctions between the pending claims and the Bertram (USP 5,613,137), Liu (USP 6,606,244) and Meadows (USP 5,053,757) references cited by the Examiner are discussed in more detail below.

Bertram discloses a computer system in which an operating system running on the host device is configured to define different regions on a touch pad (See Betram Abstract, col. 20 lls. 5-

61, and claim 1). The operating system defines the different regions according to application programs that are executed on the host CPU. Accordingly, since Betram defines the different regions using the host device operating system, this system could not be performed at a controller as claimed.

The Examiner cited to Liu, column 2, lines 6-7, and 59-61, as allegedly disclosing a touch pad controller (Action dated January 30, 2008, page3). Col 2, lines 6 and 7 state: "Additionally, the computer host includes a mother board, a CPU a memory, at least one port and a housing." Further, column 2, lines 59-61, state: "The present invention discloses a pointing device having a computer host, a housing can be further employed to encapsulate the disclosed device." In each of these sections, Liu is talking about the actual "host" device having these components. Accordingly, the host device includes an integrated pointing device and a CPU. This is shown in FIG. 2 of Liu, which shows a touch pad 102 and buttons 104 connected to host processor 110 with no separate controller between the touch pad and the host device as claimed. Accordingly, there is no teaching or suggestion in Liu of a combination including an intermediary controller between the pointing device and the host device, as claimed.

As explained above, Bertram and Liu can not be combined to achieve the claimed invention. Specifically, the combination of Betram and Liu fails to teach or suggest any controller that operates as an intermediary between the touch pad and the host device as claimed. Further, Betram describes an operating system that runs on the host device and cannot run at a controller.

The Examiner cited to Meadows as disclosing filtering. The claims, as amended, state that filtering occurs at the controller and reduces an amount of data sent to the host. Meadows fails to disclose or suggest the claimed combination of a controller and a host device, in which the controller is configured to filter in such a way so as to reduce amount of data sent to the host. In Meadows the "filtering" is accomplished to obtain a more accurate touch location by averaging several samples to determine a touch location. See Meadows, col. 35, lls. 32-35. The number of

11

samples used to determine a location or the weight of each sample may be varied in accordance with a rate of movement. See col. 38 lines 53-60. However, Meadows fails to disclose or suggest a combination which uses filtering to reduce the amount of data passed to a host device, as claimed.

In view of the above, each of the claims in this application is in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to withdraw the outstanding rejection of the claims and to pass this application to issue. If it is determined that a telephone conference would expedite the prosecution of this application, the Examiner is invited to telephone the undersigned at the number given below.

In the event the U.S. Patent and Trademark Office determines that an extension and/or other relief is required, applicants petition for any required relief including extensions of time and authorize the Commissioner to charge the cost of such petitions and/or other fees due in connection with the filing of this document to **Deposit Account No. 03-1952** referencing docket no. **106842005400**.

Dated: October 27, 2008   Respectfully submitted,

                                                By _____
                                                Jonathan Bockman
                                                    Registration No.: 45,640
                                                MORRISON & FOERSTER LLP
                                                1650 Tysons Blvd, Suite 400
                                                McLean, Virginia 22102
                                                (703) 760-7769